



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

17-AMRP-0034

NOV 21 2016

Ms. Alexandra K. Smith, Program Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Dear Ms. Smith:

**REQUEST FOR EXTENSION TO SCHEDULE FOR IMPLEMENTATION OF ACTIONS
REGARDING CONTAINER #Z7610-210**

This letter responds to the Washington State Department of Ecology's (Ecology) October 20, 2016, letter (16-NWP-175) regarding Container #Z7610-210. The U.S. Department of Energy Richland Operations Office (RL) and CH2M HILL Plateau Remediation Company (CHPRC) plan to ship Container #Z7610-210 to Perma-Fix Northwest (PFNW) for repackaging. Due to the activities required to support shipment of the container to PFNW, RL and CHPRC are requesting an extension of the 30-day document submittal deadline to February 22, 2017.

The following activities are planned/completed:

- Plan and perform Nondestructive Assay (NDA): This container requires completion of a NDA prior to shipment in order to confirm that the container complies with PFNW's license limits, based on PFNW inventory. This work has been accelerated from Fiscal Year 2018 into Fiscal Year 2017 and the field measurements have been completed;
- obtain NDA results and update records;
- brief Ecology on the Acceptable Knowledge for Container #Z7610-210;
- plan and load Container #Z7610-210 into transport conveyance;
- prepare shipping documentation;
- plan and ship Container #Z7610-210 to PFNW; and
- transmit documentation of the waste package shipment to Ecology.

Shipment of the waste package to PFNW must be coordinated with other PFNW inventory to ensure compliance with PFNW's license limits. In addition, during winter months, substantial delays in shipping may occur due to weather conditions and temperature constraints on shipments. If NDA results preclude shipment of Container #Z7610-210 to PFNW, RL and CHPRC will initiate discussions with your staff regarding the path forward.

In addition, the CHPRC container management program is undergoing redesign in an effort to respond to Ecology concerns associated with the management of containers within the Solid Waste Operations Complex. RL is working with John Price of your staff, to develop a policy solution to resolve the degraded container issues.

Ms. Alexandra K. Smith
17-AMRP-0034

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If you have any questions, please contact me or your staff may contact Ray Corey, Assistant Manager for the River and Plateau, on (509) 373-9971.

Sincerely,

A handwritten signature in dark ink, appearing to read "Doug S. Shoop". The signature is fluid and cursive, with the first name "Doug" being more prominent than the last name "Shoop".

Doug S. Shoop
Manager

AMRP:OAF

cc: D. B. Bartus, EPA
G. Bohnee, NPT
J. L. Boller, EPA
J. W. Cammann, MSA
K. A. Conaway, Ecology
L. J. Cusack, CHPRC
D. A. Faulk, EPA
S. Hudson, HAB
M. N. Jaraysi, CHPRC
R. Jim, YN
S. K. Johansen, CHPRC
P. J. Martell, WDOH
J. W. Mathey, Ecology
A. S. Mortensen, CHPRC
J. B. Price, Ecology
D. Rowland, YN
K. Schanilec, EPA
C. J. Simiele, CHPRC
R. Skeen, CTUIR
E. R. Skinnarland, Ecology
J. F. Williams, CHPRC
Administrative Record, TSD: S-2-10 (Hardcopy)
Ecology NWP Library (Hardcopy)
Environmental Portal
HF Operating Record (J. K. Perry, MSA A3-01)